

ROGERS COUNTY OKLAHOMA

JUL 10 2014

IN THE DISTRICT COURT OF ROGERS COUNTY
STATE OF OKLAHOMAJUL 10 2014
COURT CLERK
PH

SAMMI HIGGINS,

Plaintiff

v.

TAYLOR SIERRA PHILLIPS, an
Individual, THOMAS CALDWELL, an
Individual and LAUREN BEAVER, an
Individual,

Defendants

Case#: **CJ-2014-290**
JUDGEAttorney's Lien Claimed**PETITION FOR NEGLIGENCE AND NEGLIGENT ENTRUSTMENT**

COMES NOW the Plaintiff, Sammi Higgins, by and through her attorney of record, Jack Zurawik of the Zurawik Law Firm, and for her cause of action against the Defendant, Taylor Phillips, alleges and states:

1. The Plaintiff, Sammi Higgins, is and was a resident of the City of Pryor, Mayes County, and State of Oklahoma at the time of the motor vehicle collision. The Plaintiff has resided in Mayes County for thirty (30) days immediately preceding the filing of the Petition herein.
2. The Defendant, Taylor Sierra Phillips, is believed to be a resident of the City of Catoosa, Rogers County, State of Oklahoma, at the time of the collision.
3. The Defendants, Thomas Caldwell and Lauren Beaver, are believed to be residents of Mayes County, State of Oklahoma.
4. The motor vehicle collision occurred in Mayes County, State of Oklahoma.
5. That jurisdiction and venue are therefore proper in Rogers County, State of Oklahoma.
6. On or about May 6, 2013, Plaintiff, Sammi Higgins was a passenger in a motor vehicle being driven by Amanda Boyles (hereinafter called "Boyles") traveling eastbound on State Highway 20 in Mayes County, State of Oklahoma.
7. Defendant, Taylor Sierra Phillips, (hereinafter called, "Phillips") was operating a motor vehicle, believed to be owned by Defendant, Thomas Caldwell (hereinafter

